

STATE OF NEW YORK
SUPREME COURT-ONONDAGA COUNTY

LAUREN VALCHINE, INDIVIDUALLY
AND AS ADMINISTRATOR OF THE
ESTATE OF PAUL WATKINS

Plaintiffs

-against-

1ST AMENDED
COMPLAINT

COUNTY OF ONONDAGA,
ONONDAGA COUNTY SHERIFF,
PROACTIVE HEALTH CARE MEDICINE, PLLC, AND
NAPHCARE, INC.

Defendants

Lauren Valchine, individually, as natural representative of Paul Watkins's next of kin, and as Administrator of the Estate of Paul Watkins, states upon information and belief as and for her complaint as follows:

SUMMARY OF ACTION

I. This is a negligence and wrongful death action brought by Lauren Valchine, a] in her individual capacity as spouse of Paul Watkins, b] in her capacity as natural representative of Paul Watkins's next of kin, and c] in her capacity as Administrator of the Estate of Paul Watkins. Paul Watkins an inmate in the care, control and custody of Onondaga County and the Onondaga County Sheriff at the Onondaga County Justice Center was entitled to physical and mental health care. Onondaga County and the Onondaga County Sheriff contracted with Proactive Health Care Medicine, PLLC. to provide physical and mental health care to inmates at the Onondaga County Justice Center. Proactive Health Care Medicine, PLLC and NaphCare, Inc. are factually and

legally indistinguishable, or are otherwise agents, one for the other, thereby making Proactive Health Care Medicine, PLLC responsible for the actions of NaphCare, Inc.; and NaphCare, Inc. responsible for the actions of Proactive Health Care Medicine, PLLC. On December 17, 2021, while an inmate still under the care, control, and custody of Onondaga County and the Onondaga County Sheriff, Paul Watkins died due to suicide by asphyxia. [hereafter Paul Watkins is referred to as Decedent. Onondaga County, the Onondaga County Sheriff, Proactive Health Care Medicine, PLLC, and NaphCare, Inc. are jointly and severally referred to as Defendants]

2. This is also an action based on Defendants negligence, gross negligence, and deliberate indifference to Decedent's serious physical and mental health needs.

3. Upon Decedent's admission to the Onondaga County Justice Center and during his incarceration, Defendants failed to evaluate, monitor, and/or treat Decedent's physical and mental health needs.

4. Among other warning signs that Decedent was contemplating self-harm and/or suicide, while an inmate in the Onondaga County Justice Center Decedent made and received telephone calls to and from third persons stating in words and substance that he was going to kill himself. These telephone conversations were monitored, and/or were supposed to be monitored and recorded by Defendants. As warned and promised Decedent committed self-harm by suicide on or about December 16, 2021.

5. Due to Defendants' failures, inattention, and deliberate indifference to Decedent's physical and mental health, Decedent was found by Defendants unresponsive in his cell at the Onondaga County Justice Center on or about December 16, 2021. Decedent passed away from his self-imposed conduct on or about December 17, 2021 while at Upstate University Hospital in Syracuse, New York.

PARTIES

6. **Plaintiff, Lauren Valchine** is the wife of Decedent. She resides in Baldwinsville, Onondaga County, NY. She brings this action in her individual capacity as Decedent's wife, in her capacity as natural representative of Decedent's next of kin, and in her capacity as Administrator of the Estate of Paul Watkins.

7. At all times relevant hereto, Decedent resided in Onondaga County, NY.

8. At all relevant times relevant hereto, Decedent was over the age of 18.

9. Upon his death, Decedent left dependants, including: a] his wife, Lauren Valchine, and his children, b] Colton Watkins, c] Rosalia Watkins, d] Weston Watkins, e] Makayla Watkins, and f] Nathan Watkins.

10. Plaintiff, Lauren Valchine, is duly authorized to commence this proceeding. She is acting for herself as Decedent's wife, as the natural representative of Decedent's next of kin, and as Administrator of the Estate of Paul Watkins. For purposes of this lawsuit, Limited Letters of Administration in the Estate of Paul Watkins have been issued by the Onondaga County Surrogate's Court to Lauren Valchine. Attached as **Exhibit A** is the Limited Letters of Administration issued on February 10/2022.

11. The Limited Letters of Administration remain in full force and effect.

12. **Defendant, Onondaga County** is a municipal entity organized and existing under the laws of the State of New York, with principal offices located at 421 Montgomery Street, Syracuse, New York 13202.

13. **Defendant, Onondaga County Sheriff** is a Constitutionally created entity organized and existing under the laws of the State of New York, with offices at 407 South State Street, Syracuse, NY.

14. The Onondaga County Justice Center is an inmate holding facility jointly and severally owned, operated, managed, controlled, and/or maintained by Onondaga

County and the Onondaga County Sheriff.

15. At all times relevant hereto, the Onondaga County Sheriff is considered and treated by Onondaga County as an agent and department of Onondaga County; and therefore Onondaga County is responsible for all acts taken and failed to be taken by the Sheriff. At all times relevant hereto, Onondaga County is considered and treated by the Onondaga County Sheriff as his agent, and therefore the Onondaga County Sheriff is responsible for all acts taken and failed to be taken by Onondaga County.

16. **Defendant Proactive Health Care Medicine, PLLC** is a domestic professional service limited liability company registered in the State of New York with a principal place of business located at: 2090 Columbiana Road, Suite 4000, Birmingham, Alabama 35216 and doing business within the State of New York. Proactive Health Care Medicine, PLLC is correctional healthcare services provider to Onondaga County, the Onondaga County Sheriff, and/or NaphCare, Inc. Defendant Proactive Health Care Medicine, PLLC, Inc., at all time relevant hereto, was acting as an agent, servant, and/or employee of Onondaga County, the Onondaga County Sheriff, and/or NaphCare, Inc.

17. **Defendant NaphCare, Inc** is a foreign entity registered in the State of New York with a principal place of business located at: 2090 Columbiana Road, Suite 4000, Birmingham, Alabama 35216 and doing business within the State of New York. NaphCare, Inc. is correctional healthcare services provider to Onondaga County, the Onondaga County Sheriff, and/or Proactive Health Care Medicine, PLLC. Defendant NaphCare, Inc. at all time relevant hereto, was acting as an agent, servant, and/or employee of Onondaga County, the Onondaga County Sheriff, and/or Proactive Health Care Medicine, PLLC.

18. The Onondaga County Sheriff and Onondaga County were responsible, in whole or in part, for the ownership, management, supervision, and maintenance of the Onondaga County Justice Center, including all staff, agents, employees and contractors, including Proactive Health Care Medicine, PLLC and/or Naphcare, Inc.

19. Onondaga County was responsible for the physical and mental health care, safety, welfare and supervision of inmates incarcerated at the Onondaga County Justice Center.

20. The Onondaga County Sheriff was responsible for the physical and mental health care, safety, welfare and supervision of inmates incarcerated at the Onondaga County Justice Center.

21. Proactive Health Care Medicine, PLLC was responsible, either directly or as an agent of NaphCare, Inc, for the physical and mental health care, safety, welfare and supervision of inmates incarcerated at the Onondaga County Justice Center.

22. NaphCare, Inc was responsible, either directly or as an agent of Proactive Health Care Medicine, PLLC, for the physical and mental health care, safety, welfare and supervision of inmates incarcerated at the Onondaga County Justice Center.

23. At all times relevant hereto, Onondaga County and/or Onondaga County Sheriff employed, hired and/or retained Proactive Health Care Medicine, PLLC. and/or Naphcare, Inc. Defendants were jointly and severally responsible for overseeing and managing the physical and mental health care of inmates, including Decedent.

24. Onondaga County and the Onondaga County Sheriff are jointly and severally vicariously liable for the acts of Proactive Health Care Medicine, PLLC and NaphCare, Inc. under the doctrine of respondeat superior.

25. Onondaga County and the Onondaga County Sheriffs are vicariously liable for the acts of all employees, agents, staff, representatives, including all Corrections

Officers and Deputy Sheriffs under the doctrine of respondeat superior.

26. On or about March 4, 2022, Aaron Zimmerman, Esq, in his capacity as attorney for Lauren Valchine, individually and as Administrator of the Estate of Paul Watkins served a verified Notice of Claim upon Onondaga County and the Onondaga County Sheriff under New York General Municipal Law § 50-e. No adjustment or payment has been made thereon within thirty (30) days. This action is being commenced within one year and ninety days after the cause of action accrued. Attached as **Exhibit B** is a copy of the Notice of Claim.

27. Defendants failed to notice or otherwise request a New York General Municipal Law § 50-h examination and by their inaction have waived their §50-h rights to an examination.

FACTS

28. Plaintiffs incorporate, as if more fully set forth herein, all of the factual and legal assertions contained within the Notice of Claim.

29. On or about December 9, 2021 Decedent was arrested by the Onondaga County Sheriff.

30. On of about December 9, 2021 Decedent was “booked” into the Onondaga County Justice Center.

31. From on or about December 9, 2021 until December 17, 2021 Decedent was an inmate at the Onondaga county Justice Center and by that status Decedent was jointly and severally under the exclusive care, control and custody of Onondaga County, the Onondaga County Sheriff, Proactive Health Care Medicine, PLLC, and/or NaphCare, Inc.

32. While Decedent was under the care, control and custody of Defendants,

Defendants jointly and severally failed to provide Decedent with non-negligent physical and/or mental health initial evaluation, monitoring, or care, including the failure to provide counseling and the failure to provide physical or mental health treatment.

33. During the time Decedent was under the under the care, control and custody of Defendants, Defendants jointly and severally failed to provide Decedent with appropriate ongoing evaluation or treatment of his physical and/or mental health needs.

34. Among other warning signs that Decedent was suicidal, Decedent made calls from the Onondaga County Justice Center to third parties, and received calls from third parties threatening and promising he would kill himself.

35. Decedent's phone calls whether made or received to and from third parties. were monitored, or able to be monitored and recorded by Defendants. Defendants jointly severally failed to properly monitor Decedent's phone calls and failed to take necessary action once Decedent threatened and promised to kill himself or otherwise engage in self-harm.

36. Defendants jointly and severally failed to organize, furnish, and/or otherwise equip Decedent's cell so that he was unable to access items and devices, including bedding, or apparel, which could be used to commit suicide or other self-harm.

37. Defendants and their agents, jointly and severally, knew or should have known that Decedent was at risk of killing himself, or otherwise at risk of self-harm.

38. Defendants failed to place Decedent on Constant Watch, Suicide Watch and/or otherwise adequately monitor and observe him to prevent self-harm.

39. On or about the evening of December 16, 2021, Defendants failed to engage in reasonable and necessary monitoring of Decedent. At that time, Decedent engaged in acts of self-harm.

40. By the time Defendants observed or otherwise monitored on or about December 16, 2021, Decedent he was lying on the floor unresponsive and unconscious.

41. On or about December 16, 2021, Defendants called for Emergency Medical Services. EMS personnel arrived at the scene. Decedent was transferred via ambulance to Upstate University Hospital. While physically at Upstate University Hospital Decedent was examined.

42. Decedent was declared dead on December 17, 2021 at Upstate University Hospital in Syracuse, New York with an apparent cause of death by suicide

**AS A FIRST CAUSE OF ACTION AGAINST ONONDAGA COUNTY
AND THE ONONDAGA COUNTY SHERIFF**

43. At all times relevant hereto decedent was an inmate of the Onondaga County Justice Center, and was jointly and severally under the exclusive care, control, and custody of Defendants.

44. From the moment of decedent's arrest by an Onondaga County Deputy Sheriff, Defendants jointly and severally had a duty to fully assess, screen, monitor, and evaluate Decedent's physical and mental health.

45. Defendants jointly and severally had an ongoing duty to provide Decedent with health care, including mental health care so as to maintain the safety, health, and well-being of Decedent.

46. At all times relevant to this action, Defendants had a duty to provide non-negligent care necessary to prevent foreseeable harm to Decedent.

47. Defendants were jointly and severally obligated to supervise the acts of all Onondaga County Justice Center support staff, employees, agents, representatives, including all Corrections Officers and Deputy Sheriffs, and all contracted health care personnel employed by Proactive Health Care Medicine, PLLC, and/or NaphCare, Inc.

48. While Decedent was in the custody of Defendants, Defendants and their agents, servants, assigns, and/or employees had a duty to evaluate, supervise, monitor, and safeguard Decedent's well-being and to keep track of his physical whereabouts.

49. At all times relevant to this action, said Defendants were jointly and severally aware, and/or in the exercise of reasonable care, should have been aware of facts, circumstances, comments, and behavior of Decedent that he posed a reasonably foreseeable and objective threat and danger of self-harm.

50. At all times relevant to this action, said Defendants knew of and disregarded the substantial risk of harm that Decedent posed to himself and otherwise failed to take reasonable and/or proper precautions to prevent Decedent from engaging in self-harm.

51. Defendants jointly and severally breached their duty to decedent by:

- a. Failing to adequately supervise Decedent;
- b. Failing to adequately and properly observe Decedent in his cell;
- c. Failing to adequately monitor Decedent's activities while he was an inmate at the Onondaga County Justice Center;
- d. Failing to properly evaluate, assess and/or monitor Decedent's physical and mental health;
- e. Failing to provide Decedent with physical and mental health evaluation, care, and/or treatment;
- f. Failing to adequately perform intake procedures which would inform Defendants and/or their agents, servants, assigns, and/or employees of an individual's physical and mental health history;
- g. Failing to intervene to provide prompt and/or adequate, including physical and mental health treatment to Decedent;
- h. Failing to have a policy, custom, and practice of providing adequate attention and/or treatment to inmates, including Decedent, with medical, physical and/or mental health needs;
- i. Failing to monitor and ensure that Decedent was not engaging in self-

harm;

- j. Failing to transfer Decedent to a more appropriate incarceration facility and/or more appropriate treatment provider(s);
- k. Failing to share necessary information with Justice Center personnel so that all relevant Justice Center employees and agents were made aware of the risk of self-harm Decedent posed to himself;
- m. Failing to organize, furnish, and otherwise equip Decedent's cell so as to ensure he lacked the ability to access any items or devices which could be used to engage in self-harm;
- n. Failing to adequately staff the Onondaga County Justice Center so as to ensure the officers' and/or contractors' abilities to adequately evaluate, monitor, and supervise Decedent;
- o. Failing to adequately and properly train, screen, supervise, and/or discipline employees and/or contractors of the Onondaga County Justice Center with respect to the serious physical and mental health needs of Decedent and how to respond to mental and physical health problems exhibited by Decedent;
- p. Failing to train relevant Onondaga County Justice Center employees and/or contractors who oversaw Decedent's incarceration in identifying and responding to physical and/or mental health needs;
- q. Failing to evaluate, monitor, and/or supervise Decedent in accordance with internal policy, statewide regulations, and/or other pertinent practices, policies, laws, rules, and/or regulations for monitoring inmates at risk of self-harm in a correctional environment;
- r. Failing to follow all of Defendants' internal rules and protocols to prevent inmate self-harm, including suicides, and/or suicide attempts;
- s. Failing to intervene to prevent the Decedent's attempt at self-harm and suicide;
- t. Failing to promptly respond to prevent individuals who have physical and/or mental health needs from attempting or completing self-harm,

- including suicide;
- u. Failing to provide prompt and/or adequate medical care to individuals who have engaged in acts of self-harm;
 - v. Ignoring or otherwise being deliberately indifferent to indications from Decedent that his physical and/or mental health was disturbed and that he was suicidal and/or in the process of attempting to commit suicide;
 - w. Otherwise failing to act and adequately respond to an inmate such as Decedent who represented a risk of self-harm and suicide;
 - x. Maintaining and developing policies that exhibit deliberate indifference to the safety of inmates, which allow inmates the ability to commit suicide while under the care, custody, control, supervision, and management of the Defendants;
 - y. Failing to adequately monitor security devices so as to become aware of and to prevent Decedent's ability to commit self-harm and suicide;
 - z. Failing to have adequate security devices, such as cameras, in place to monitor inmate activity and prevent inmate self-harm, including suicides;
 - aa. Failing to properly supervise its agents, servants, assigns, and/or employees while said individuals were on duty;
 - bb. Failing to properly document complaints, reports, and/or investigations with regard to inmate safety and act on the same;
 - cc. Negligently failing to report, reprimand, and otherwise discipline improper and/or illegal behavior, including failing to follow statutes, rules, regulations, and/or policy regarding potential inmate self-harm;
 - dd.. Failing to exercise due diligence;
 - ee. Failing to maintain a safe environment for inmates, including providing "suicide smocks," "suicide apparel" and/or "suicide blankets;"
 - ff. Intentionally and/or negligently violating the civil and constitutional rights of Decedent, secured by the Constitutions of the United States and of the State of New York, including the Eighth and Fourteenth Amendments of the United States Constitution and Article I, Sections V and XI of the

New York State Constitution and Section 28 of the New York State Civil Right Law.

52. As a result and a proximate cause of the foregoing, Plaintiff's have suffered damages because of the Defendants negligent actions and negligent omissions to act.

53. As a result of the foregoing, Decedent sustained serious and permanent personal injuries caused while conscious but unable to breath during the process of dying by asphyxiation; related physical pain and emotional suffering; loss of earnings and earning capacity; pre-death conscious physical pain and emotional suffering, mental anguish; and wrongful death.

54. Punitive damages against all Defendants, jointly and severally, are demanded and are warranted under the circumstances.

55. Defendants are not entitled to qualified immunity.

56. As a result of the foregoing, Plaintiff's have been damaged in an amount which exceeds the jurisdictional limits of lower courts of the State of New York which otherwise would have jurisdiction in this action.

AS AND FOR A SECOND CAUSE OF ACTION AGAINST Proactive Health Care Medicine, PLLC AND NAPHCARE, INC.

57. During the period of time that decedent was in the exclusive care, control and custody of Defendants, Proactive Health Care Medicine, PLLC and/or NaphCare, Inc. were non-governmental, private independent contractors jointly and severally retained and paid by Onondaga County and the Onondaga County Sheriff to provide, oversee, and/or manage the physical and mental health care of inmates in the Onondaga County Justice Center, including the Decedent.

58. The health care personnel employed or otherwise retained by Proactive Health

Care Medicine, PLLC and/or NaphCare, Inc. in connection with their contract, directly and/or through the acts of its agents, servants, assigns, and/or employees, breached the duty owed to Decedent to oversee and manage physical and mental health care of inmates at the Onondaga County Justice Center, including Decedent, had an affirmative duty to provide Decedent with non-negligent, competent, and responsive health care, including physical and mental health assessment, evaluation, monitoring, treatment, and care.

59. Defendant Proactive Health Care Medicine, PLLC, and/or NaphCare, Inc. directly and/or through the acts of its agents, servants, assigns, and/or employees, breached its duty owed to Decedent by:

- a. Failing to adequately supervise Decedent;
- b. Failing to adequately and properly observe Decedent in his cell;
- c. Failing to adequately monitor Decedent's activities while he was an inmate at the Onondaga County Justice Center;
- d. Failing to properly evaluate, assess and/or monitor Decedent's physical and mental health;
- e. Failing to provide Decedent with physical and mental health evaluation, care, and/or treatment;
- f. Failing to adequately perform intake procedures which would inform Defendants and/or their agents, servants, assigns, and/or employees of an individual's physical and mental health history;
- g. Failing to intervene to provide prompt and/or adequate, including physical and mental health treatment to Decedent;
- h. Failing to have a policy, custom, and practice of providing adequate attention and/or treatment to inmates, including Decedent, with medical, physical and/or mental health needs;
- i. Failing to monitor and ensure that Decedent was not engaging in self-harm;

- j. Failing to transfer Decedent to a more appropriate incarceration facility and/or more appropriate treatment provider(s);
- k. Failing to share necessary information with Justice Center personnel so that all relevant Justice Center employees and agents were made aware of the risk of self-harm Decedent posed to himself;
- h. Failing to organize, furnish, and otherwise equip Decedent's cell so as to ensure he lacked the ability to access any items or devices which could be used to engage in self-harm;
- o. Failing to train relevant Onondaga County Justice Center employees and/or contractors who oversaw Decedent's incarceration in identifying and responding to physical and/or mental health needs;
- p. Failing to evaluate, monitor, and/or supervise Decedent in accordance with internal policy, statewide regulations, and/or other pertinent practices, policies, laws, rules, and/or regulations for monitoring inmates at risk of self-harm in a correctional environment;
- q. Failing to follow all of Defendants' internal rules and protocols to prevent inmate self-harm, including suicides, and/or suicide attempts;
- r. Failing to intervene to prevent the Decedent's attempt at self-harm and suicide;
- s. Failing to promptly respond to prevent individuals who have physical and/or mental health needs from attempting or completing self-harm, including suicide;
- t. Failing to provide prompt and/or adequate medical care to individuals who have engaged in acts of self-harm;
- u. Ignoring or otherwise being deliberately indifferent to indications from Decedent that his physical and/or mental health was disturbed and that he was suicidal and/or in the process of attempting to commit suicide;
- v. Otherwise failing to act and adequately respond to an inmate such as Decedent who represented a risk of self-harm and suicide;
- w. Maintaining and developing policies that exhibit deliberate indifference

to the safety of inmates, which allow inmates the ability to commit suicide while under the care, custody, control, supervision, and management of the Defendants;

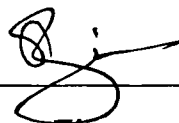
- x. Failing to adequately monitor security devices so as to become aware of and to prevent Decedent's ability to commit self-harm and suicide;
- y. Failing to have adequate security devices, such as cameras, in place to monitor inmate activity and prevent inmate self-harm, including suicides;
- z. Failing to properly supervise its agents, servants, assigns, and/or employees while said individuals were on duty;
- aa. Failing to exercise due diligence;
- bb. Failing to maintain a safe environment for inmates, including providing "suicide smocks," "suicide apparel" and/or "suicide blankets;"
- cc. Intentionally and/or negligently violating the civil and constitutional rights of Decedent, secured by the Constitutions of the United States and of the State of New York, including the Eighth and Fourteenth Amendments of the United States Constitution and Article I, Sections V and XI of the New York State Constitution and Section 28 of the New York State Civil Right Law. 67. Defendant, Proactive Health Care Medicine, PLLC is vicariously liable under the doctrine of respondeat superior for any of the negligent acts or negligent omissions to act committed by their medical staff, agents, servants, and/or employees.

60. As a result and a proximate cause of the foregoing, plaintiffs suffered damages because of the Defendants foregoing negligent actions and negligent omissions to act committed by Defendants.

61. As a result of the foregoing, Decedent sustained serious and permanent personal injuries, including asphyxiation; physical pain and emotional suffering; loss of earnings and earning capacity; pre-death conscious physical pain and emotional suffering, mental anguish; and wrongful death.

62. Decedent is survived by next of kin, including a wife and minor children.
63. Further, punitive damages against all Defendants are demanded and are warranted and proper under the circumstances.
64. Defendants are not entitled to qualified immunity under the circumstances.
65. Plaintiffs have been damaged in an amount which exceeds the jurisdictional limits of lower courts of the State of New York which otherwise would have jurisdiction in this action.

Dated February 16, 2023



Aaron Zimmerman, Esq.
Co-Counsel to Plaintiffs
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az@ZiPiLaw.com

Lawrence A. Wangerman, Esq.
Co-Counsel to Plaintiffs
3260 Ora gulf Road
Manlius, NY 13104
wangerool@aol.com

Exhibit A

On the Date Written Below LETTERS are Granted by the Surrogate's Court, State of New York as follows:

Name of : Paul G. Watkins **File #:** 2022-18/A
Date of Death: December 17, 2021
Domicile of : County of Onondaga
Fiduciary Appointed: Lauren E Valchine
Mailing Address 8754 Tallwood Ridge
Baldwinsville NY 13027

Letters Issued: LIMITED LETTERS OF ADMINISTRATION

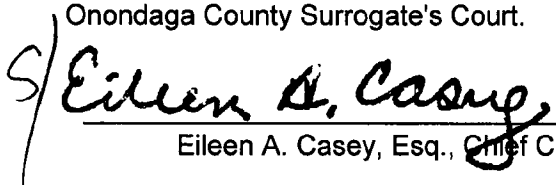
Limitations: Said administrator(s), in both his/her/their individual and fiduciary capacity/capacities as well as any attorney who represents him/her/them in either capacity/capacities, shall not collect or receive the proceeds from any action instituted or settled pursuant to the authority granted by these letters without the further order of this court or any court of competent jurisdiction pursuant to EPTL 5-4.6

THESE LETTERS, granted pursuant to a decree entered by the court, authorize and empower the above-named fiduciary or fiduciaries to perform all acts requisite to the proper administration and disposition of the estate/trust of the in accordance with the decree and the laws of New York State, subject to the limitations and restrictions, if any, as set forth above.

Dated: February 10, 2022

IN TESTIMONY WHEREOF, the seal of the Onondaga County Surrogate's Court has been affixed.

WITNESS, Hon Mary Keib Smith, Judge of the Onondaga County Surrogate's Court.


Eileen A. Casey, Esq., Chief Clerk

These Letters are Not Valid Without the Raised Seal of the Onondaga County Surrogate's Court

Attorney:
Laurence A. Wangerman
333 East Onondaga Street, Suite 4B
Syracuse NY 13202

At a Surrogate's Court of the State of New
York held in and for the County of
Onondaga at Syracuse, New York.

PRESENT: Hon. Mary Keib Smith, Surrogate

**Administration Proceeding, Estate of
Paul G. Watkins**

**DECREE GRANTING LIMITED
ADMINISTRATION**

File No. 2022-18/A

Deceased.

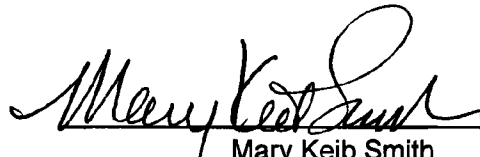
A verified petition having been filed by Lauren E Valchine praying that administration of the goods, chattels and credits of the above-named decedent be granted to Lauren E Valchine and all persons named in such petition, required to be cited, having been cited to show cause why such relief should not be granted, have either failed to appear in response to a served citation or having waived the issuance of such citation and consented thereto; and it appearing that Lauren E Valchine is in all respects competent to act as administrator of the estate of said deceased; now it is

ORDERED AND DECREED, that Limited Letters of Administration issue to Lauren E Valchine upon proper qualification and the filing of a bond be and hereby is dispensed with; and it is further

ORDERED AND DECREED, that the authority of such administrator be restricted in accordance with, and that the letters herein issued contain, the limitation(s) as follows:

Limitations/Restrictions: Said administrator(s), in both his/her/their individual and fiduciary capacity/capacities as well as any attorney who represents him/her/them in either capacity/capacities, shall not collect or receive the proceeds from any action instituted or settled pursuant to the authority granted by these letters without the further order of this court or any court of competent jurisdiction pursuant to EPTL 5-4.6

DATED: February 10, 2022



Mary Keib Smith
Surrogate

**SURROGATE'S COURT
FILED**

FEB 10 2022

**COUNTY OF ONONDAGA
STATE OF NEW YORK**

Exhibit B

State of New York
Supreme Court-Onondaga County

Estate of Paul G. Watkins, and
Lauren E. Valchine, individually and as natural
guardian for: Colton Watkins, Rosalia Watkins,
Weston Watkins, Makayla Watkins, and
Nathan Watkins

Claimants-Plaintiffs

v

Onondaga County, and
Onondaga County Sheriff
Respondents-Defendants

Notice of Claim
GML §50-e
and
Proof of Service

NOTICE OF CLAIM

Aaron Zimmerman, Esq, being duly sworn does depose and say upon information and belief as follows:

1. This affidavit-claim is being made pursuant to General Municipal Law §50-e.

2. Claimants names and their post office address are:

Estate of Paul G. Watkins
8754 Tallwood Ridge
Baldwinsville, NY 13027, and

Lauren E. Valchine, individually and as natural guardian for: Colton
Watkins, Rosalia Watkins, Weston Watkins, Makayla Watkins, and
Nathan Watkins
8754 Tallwood Ridge
Baldwinsville, NY 13027

3. Claimants' attorneys are:

<p>Aaron Zimmerman, Esq 117 South State Street Syracuse, NY 13202 [T] 315.475.7777 [F] 315.475.4225 az@ZiPiLaw.com</p>	<p>Lawrence A. Wangerman, Esq 3260 Oran Gulf Road Manlius, NY 13104 wangerool@aol.com</p>
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4. Onondaga County, is a New York State municipality which owns, operates, staffs, and otherwise is in control of the facility known as the:

Onondaga County Justice Center
555 South State Street
Syracuse, NY 13202.

5. The Onondaga County Sheriff is a New York State Constitutional officer. The Onondaga County Sheriff is invested with the power and responsibility to be Onondaga County's chief police enforcement officer. The Sheriff's powers and responsibilities include the power of arrest and power to incarcerate inmates within the Onondaga County Justice Center. The Sheriff's powers and responsibilities further include staffing, operating, controlling, and overseeing the inmates kept, and housed in the Onondaga County Justice Center.

6. The nature of this claim:

This is a claim based on tort principles, concepts, and theories against Onondaga County and/or the Onondaga County Sheriff; including, but not limited to: negligence-- that is the failure to take an act or acts that should have been taken but was/were not, or, the taking of an act or acts which should not have been taken but was/were taken; negligence in the ownership, operations and control of the Onondaga County Justice Center, negligent hiring of employees agents and servants who were performing activities in and for the Onondaga County Justice Center, failure to properly, competently and timely evaluate incoming and incarcerated

inmates for aberrational activities, signs and/or symptoms, failure to properly, competently and timely evaluate incoming and incarcerated inmates for abnormal activities, signs and/or symptoms of potential self-injury, failure to properly, competently and timely evaluate incoming and incarcerated inmates for abnormal activities, signs and/or symptoms for suicide; failure to properly hire, staff, manage, and supervise the inmates during their stays in the Onondaga County Justice Center; failure to provide adequate food, accommodations, and services for incarcerated inmates, including but limited to clothing, bedding, and facilities that are suicide and self-injury proof; wrongful death; spousal derivative loss of society, services and companionship; loss of education, love and services for decedent's minor children.

7. The time when, place where, and the manner on which the claim arose:

Paul G Watkins [hereafter Decedent] was placed under arrest by a member of the Onondaga County Sheriff's Department on December 9, 2021, in the Town of Cicero. Decedent was thereafter until his death on December 17, 2021 in the care, control and custody of the Onondaga County Sheriff and/or the County of Onondaga.

From December 9, 2021, when arrested, until December 17, 2021 when he died, decedent was under the care, control and custody of Onondaga County and/or the Onondaga County Sheriff and incarcerated in the Onondaga County Justice Center.

On or about December 16, 2021 at about 11:30pm, decedent was observed by a Corrections Officer hanging by the neck. Decedent was then transported to an off-site medical facility where he was evaluated and pronounced dead.

8. In support of this claim, attached are copies of the following documents:

- a] Town of Cicero Arrest Report dated 12/009/2021 [redacted]
- b] Certificate of Death dated 12/21/2021 [redacted]
- c] Limited Letters of Administration dated 02/10/22 [redacted]
- d] Certificate of Marriage dated 01/04/2011 [redacted]

- e] Certificate of Birth Dated 12/21/2007 [redacted]
- f] Certificate of Birth Dated 11/23/2010 [redacted]
- g] Certificate of Birth Dated 11/16/2017 [redacted]
- h] Certificate of Birth Dated 12/11/2018 [redacted]
- I] Certificate of Birth Dated 08/13/2015 [redacted]

9. Items of damages or injuries:

Physical pain; emotional suffering; fear of death; agony; loss of spousal society, companionship, and services; loss of spousal and fatherly financial support; loss of fatherly love, services, and education; together with other general and special damages.

10. Claimants' further allege the circumstances of this claim justify punitive damages against the Onondaga County Sheriff and Onondaga County.

PROOF OF SERVICE

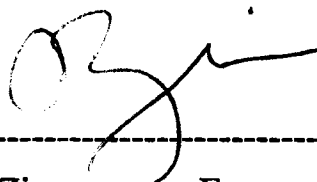
Aaron Zimmerman, Esq, being duly sworn does depose and say as follows

11. On March 4, 2022, this Claim and the attachments described herein have been tendered to the US Postal Service, in a sealed envelope, bearing sufficient postage, to be delivered by Certified mail, Return Receipt Requested, to:

Sheriff Eugene J. Conway
Onondaga County Sheriff
407 South State Street
Syracuse, NY 13202

Robert A. Durr, Esq.
Onondaga County Attorney, Department of Law
John H. Mulroy Civic Center, 10th Floor
421 Montgomery Street
Syracuse, NY 13202

Dated: March 4, 2021



Aaron Zimmerman, Esq.
117 South State Street
Syracuse, New York 13202
[T] 315.475.7777
[F] 315.475.4225
az@ZiPiLaw.com

Notary Public

On March 4, 2021, Aaron Zimmerman personally appeared before me proved his identity and upon being duly sworn did state that this Claim and Proof of Service is made by him, as one of the attorneys for and on behalf of Estate of Paul G. Watkins, and Lauren E. Valchine, individually and as natural guardian for Colton Watkins, Rosalia Watkins, Weston Watkins, Makayla Watkins, and Nathan Watkins, and he did say that the facts of this claim is true and accurate, except as to those facts stated to be upon informaion and beleif and as to those facts he believes them to be true, and he thereupon subscribed his signature.



ANDREW N. PIRAINO
Notary Public, State of New York
Qualified in Onondaga Co. No. 02PI-801262
My Commission Expires April 30, 2022

1. NYSD No. NY		2. OBT No.		New York State ARREST REPORT		3. Case No. 21-597370		4. Unit No.	
5. FBI No.		6. Arrest No. 21-A-330		7. Agency 15 Cicero Police		8. Division/Unit Patrol 3302		9.	
10. Last Watkins		First Paul		MI G		10. Alias/Other Name (Last, First, Middle) None		11. Phone Number (315) 720-3812	
12. Address # [REDACTED]		Prefix [REDACTED]		Street Name [REDACTED]		Street Type [REDACTED]		13. City North Syracuse	
14. Resident Status Resident		15. Place of Birth Syracuse, NY		16. Date of Birth 08/01/1983		17. Age 38		18. Sex M	
19. Race White		20. Ethnicity Non Hisp		21. Skin Light		22. Hgt 5' 09"		23. Weight 175	
24. Hair BLN		25. Eyes GRN		26. Glasses No		27. Build Medium		28. Marital Status Married	
29. U.S. Citizen Yes		30. Citizen of USA		31. Social Security No. [REDACTED]		32. Education 09		33. Religion None	
34. Occupation Laborer		35. Employed Yes		36. Scars/Marks/Tattoos (Describe) Rose On Neck		37. Arresting Officer S. Wallace		38. ID No. 0720	
39. Arresting Officer J. Kazmirski		40. ID No. Agency 0785 15 Cicero Police		41. Arrest Date 12/09/2021		42. Time 00:46			
43. Location of Arrest City/Town/Village Towns Cicero		Address No. 7790		Prefix [REDACTED]		Street Name Frontage		Street Type RD	
44. State NY		45. Zip 13039		46. Juvenile No		47. Defendant Condition At Arrest Appeared Normal		48. Weapon(s) At Arrest None/Not Applicable	
49. Co-defendants Arrest No.		50. Miranda No		51. Miranda By [REDACTED]		52. Miranda Date 11		53. Miranda Time [REDACTED]	
54. Statements None		55. State [REDACTED]		56. Search Warrant No		57. ID Procedure None			
58. Arraignment Court Cicero		59. Arraignment Judge Presiding		60. Date 12/09/2021		61. Time 00:00		62. Property No	
63. Evidence No		64. Bail Amount \$		65. Bailman [REDACTED]		66. Photo No. [REDACTED]		67. Arrest Type CIP	
68. Warrant No. [REDACTED]		69. Arrest FGA No		70. Other Agency [REDACTED]		71. F.P. Taken Yes		72. Location of Office City/Town/Village Towns Cicero	
73. County Onondaga		74. State NY		75. Office Date 12/09/2021		76. No. Offenders 01		77. No. Victims 01	
78. Return Court Cicero		79. Return Judge [REDACTED]		80. Return Date 12/09/21		81. Time 16:00			
82. Defendant/Case TOT Agency		83. Officer's Name [REDACTED]		84. ID No. [REDACTED]		85. Time [REDACTED]		86. Date 11	
87. Law PL		Article & Section 21550		Sub 03		Class A		Category M	
Degree 2		Attempt N		Offense Name Criminal Contempt		Count 01		Victim Sex [REDACTED]	
Handicap [REDACTED]		Assoc. No. [REDACTED]		Type [REDACTED]					
88. Law [REDACTED]		Article & Section [REDACTED]		Sub [REDACTED]		Class [REDACTED]		Category [REDACTED]	
Degree [REDACTED]		Attempt [REDACTED]		Offense Name [REDACTED]		Count [REDACTED]		Victim Sex [REDACTED]	
Handicap [REDACTED]		Assoc. No. [REDACTED]		Type [REDACTED]					
89. Law [REDACTED]		Article & Section [REDACTED]		Sub [REDACTED]		Class [REDACTED]		Category [REDACTED]	
Degree [REDACTED]		Attempt [REDACTED]		Offense Name [REDACTED]		Count [REDACTED]		Victim Sex [REDACTED]	
Handicap [REDACTED]		Assoc. No. [REDACTED]		Type [REDACTED]					
90. Law [REDACTED]		Article & Section [REDACTED]		Sub [REDACTED]		Class [REDACTED]		Category [REDACTED]	
Degree [REDACTED]		Attempt [REDACTED]		Offense Name [REDACTED]		Count [REDACTED]		Victim Sex [REDACTED]	
Handicap [REDACTED]		Assoc. No. [REDACTED]		Type [REDACTED]					
91. Law [REDACTED]		Article & Section [REDACTED]		Sub [REDACTED]		Class [REDACTED]		Category [REDACTED]	
Degree [REDACTED]		Attempt [REDACTED]		Offense Name [REDACTED]		Count [REDACTED]		Victim Sex [REDACTED]	
Handicap [REDACTED]		Assoc. No. [REDACTED]		Type [REDACTED]					
92. Law [REDACTED]		Article & Section [REDACTED]		Sub [REDACTED]		Class [REDACTED]		Category [REDACTED]	
Degree [REDACTED]		Attempt [REDACTED]		Offense Name [REDACTED]		Count [REDACTED]		Victim Sex [REDACTED]	
Handicap [REDACTED]		Assoc. No. [REDACTED]		Type [REDACTED]					
93. Law [REDACTED]		Article & Section [REDACTED]		Sub [REDACTED]		Class [REDACTED]		Category [REDACTED]	
Degree [REDACTED]		Attempt [REDACTED]		Offense Name [REDACTED]		Count [REDACTED]		Victim Sex [REDACTED]	
Handicap [REDACTED]		Assoc. No. [REDACTED]		Type [REDACTED]					
94. Law [REDACTED]		Article & Section [REDACTED]		Sub [REDACTED]		Class [REDACTED]		Category [REDACTED]	
Degree [REDACTED]		Attempt [REDACTED]		Offense Name [REDACTED]		Count [REDACTED]		Victim Sex [REDACTED]	
Handicap [REDACTED]		Assoc. No. [REDACTED]		Type [REDACTED]					
95. Law [REDACTED]		Article & Section [REDACTED]		Sub [REDACTED]		Class [REDACTED]		Category [REDACTED]	
Degree [REDACTED]		Attempt [REDACTED]		Offense Name [REDACTED]		Count [REDACTED]		Victim Sex [REDACTED]	
Handicap [REDACTED]		Assoc. No. [REDACTED]		Type [REDACTED]					
96. Law [REDACTED]		Article & Section [REDACTED]		Sub [REDACTED]		Class [REDACTED]		Category [REDACTED]	
Degree [REDACTED]		Attempt [REDACTED]		Offense Name [REDACTED]		Count [REDACTED]		Victim Sex [REDACTED]	
Handicap [REDACTED]		Assoc. No. [REDACTED]		Type [REDACTED]					
97. Law [REDACTED]		Article & Section [REDACTED]		Sub [REDACTED]		Class [REDACTED]		Category [REDACTED]	
Degree [REDACTED]		Attempt [REDACTED]		Offense Name [REDACTED]		Count [REDACTED]		Victim Sex [REDACTED]	
Handicap [REDACTED]		Assoc. No. [REDACTED]		Type [REDACTED]					
98. Law [REDACTED]		Article & Section [REDACTED]		Sub [REDACTED]		Class [REDACTED]		Category [REDACTED]	
Degree [REDACTED]		Attempt [REDACTED]		Offense Name [REDACTED]		Count [REDACTED]		Victim Sex [REDACTED]	
Handicap [REDACTED]		Assoc. No. [REDACTED]		Type [REDACTED]					
99. Law [REDACTED]		Article & Section [REDACTED]		Sub [REDACTED]		Class [REDACTED]		Category [REDACTED]	
Degree [REDACTED]		Attempt [REDACTED]		Offense Name [REDACTED]		Count [REDACTED]		Victim Sex [REDACTED]	
Handicap [REDACTED]		Assoc. No. [REDACTED]		Type [REDACTED]					
100. Law [REDACTED]		Article & Section [REDACTED]		Sub [REDACTED]		Class [REDACTED]		Category [REDACTED]	
Degree [REDACTED]		Attempt [REDACTED]		Offense Name [REDACTED]		Count [REDACTED]		Victim Sex [REDACTED]	
Handicap [REDACTED]		Assoc. No. [REDACTED]		Type [REDACTED]					
101. Law [REDACTED]		Article & Section [REDACTED]		Sub [REDACTED]		Class [REDACTED]		Category [REDACTED]	
Degree [REDACTED]		Attempt [REDACTED]		Offense Name [REDACTED]		Count [REDACTED]		Victim Sex [REDACTED]	
Handicap [REDACTED]		Assoc. No. [REDACTED]		Type [REDACTED]					
102. Law [REDACTED]		Article & Section [REDACTED]		Sub [REDACTED]		Class [REDACTED]		Category [REDACTED]	
Degree [REDACTED]		Attempt [REDACTED]		Offense Name [REDACTED]		Count [REDACTED]		Victim Sex [REDACTED]	
Handicap [REDACTED]		Assoc. No. [REDACTED]		Type [REDACTED]					
103. Law [REDACTED]		Article & Section [REDACTED]		Sub [REDACTED]		Class [REDACTED]		Category [REDACTED]	
Degree [REDACTED]		Attempt [REDACTED]		Offense Name [REDACTED]		Count [REDACTED]		Victim Sex [REDACTED]	
Handicap [REDACTED]		Assoc. No. [REDACTED]		Type [REDACTED]					
104. Law [REDACTED]		Article & Section [REDACTED]		Sub [REDACTED]		Class [REDACTED]		Category [REDACTED]	
Degree [REDACTED]		Attempt [REDACTED]		Offense Name [REDACTED]		Count [REDACTED]		Victim Sex [REDACTED]	
Handicap [REDACTED]		Assoc. No. [REDACTED]		Type [REDACTED]					
105. Law [REDACTED]		Article & Section [REDACTED]		Sub [REDACTED]		Class [REDACTED]		Category [REDACTED]	
Degree [REDACTED]		Attempt [REDACTED]		Offense Name [REDACTED]		Count [REDACTED]		Victim Sex [REDACTED]	
Handicap [REDACTED]		Assoc. No. [REDACTED]		Type [REDACTED]					
106. Law [REDACTED]		Article & Section [REDACTED]		Sub [REDACTED]		Class [REDACTED]		Category [REDACTED]	
Degree [REDACTED]		Attempt [REDACTED]		Offense Name [REDACTED]		Count [REDACTED]		Victim Sex [REDACTED]	
Handicap [REDACTED]		Assoc. No. [REDACTED]		Type [REDACTED]					
107. Law [REDACTED]		Article & Section [REDACTED]		Sub [REDACTED]		Class [REDACTED]		Category [REDACTED]	
Degree [REDACTED]		Attempt [REDACTED]		Offense Name [REDACTED]		Count [REDACTED]		Victim Sex [REDACTED]	
Handicap [REDACTED]		Assoc. No. [REDACTED]		Type [REDACTED]					
108. Law [REDACTED]		Article & Section [REDACTED]		Sub [REDACTED]		Class [REDACTED]		Category [REDACTED]	
Degree [REDACTED]		Attempt [REDACTED]		Offense Name [REDACTED]		Count [REDACTED]		Victim Sex [REDACTED]	
Handicap [REDACTED]		Assoc. No. [REDACTED]		Type [REDACTED]					
109. Law [REDACTED]		Article & Section [REDACTED]		Sub [REDACTED]		Class [REDACTED]		Category [REDACTED]	
Degree [REDACTED]		Attempt [REDACTED]		Offense Name [REDACTED]		Count [REDACTED]		Victim Sex [REDACTED]	
Handicap [REDACTED]		Assoc. No. [REDACTED]		Type [REDACTED]					
110. Law [REDACTED]		Article & Section [REDACTED]		Sub [REDACTED]		Class [REDACTED]		Category [REDACTED]	
Degree [REDACTED]		Attempt [REDACTED]		Offense Name [REDACTED]		Count [REDACTED]		Victim Sex [REDACTED]	
Handicap [REDACTED]		Assoc. No. [REDACTED]		Type [REDACTED]					
111. Law [REDACTED]		Article & Section [REDACTED]		Sub [REDACTED]		Class [REDACTED]		Category [REDACTED]	
Degree [REDACTED]		Attempt [REDACTED]		Offense Name [REDACTED]		Count [REDACTED]		Victim Sex [REDACTED]	
Handicap [REDACTED]		Assoc. No. [REDACTED]		Type [REDACTED]					
112. Law [REDACTED]		Article & Section [REDACTED]		Sub [REDACTED]		Class [REDACTED]		Category [REDACTED]	
Degree [REDACTED]		Attempt [REDACTED]		Offense Name [REDACTED]		Count [REDACTED]		Victim Sex [REDACTED]	
Handicap [REDACTED]		Assoc. No. [REDACTED]		Type [REDACTED]					
113. Law [REDACTED]		Article & Section [REDACTED]		Sub [REDACTED]		Class [REDACTED]		Category [REDACTED]	
Degree [REDACTED]		Attempt [REDACTED]		Offense Name [REDACTED]		Count [REDACTED]		Victim Sex [REDACTED]	
Handicap [REDACTED]		Assoc. No. [REDACTED]		Type [REDACTED]					
114. Law [REDACTED]		Article & Section [REDACTED]		Sub [REDACTED]		Class [REDACTED]		Category [REDACTED]	
Degree [REDACTED]		Attempt [REDACTED]		Offense Name [REDACTED]		Count [REDACTED]		Victim Sex [REDACTED]	
Handicap [REDACTED]		Assoc. No. [REDACTED]		Type [REDACTED]					
115. Law [REDACTED]		Article & Section [REDACTED]		Sub [REDACTED]		Class [REDACTED]		Category [REDACTED]	
Degree [REDACTED]		Attempt [REDACTED]		Offense Name [REDACTED]		Count [REDACTED]		Victim Sex [REDACTED]	
Handicap [REDACTED]		Assoc. No. [REDACTED]		Type [REDACTED]					
116. Law [REDACTED]		Article & Section [REDACTED]		Sub [REDACTED]		Class [REDACTED]		Category [REDACTED]	
Degree [REDACTED]		Attempt [REDACTED]		Offense Name [REDACTED]		Count [REDACTED]		Victim Sex [REDACTED]	
Handicap [REDACTED]		Assoc. No. [REDACTED]		Type [REDACTED]					
117. Law [REDACTED]		Article & Section [REDACTED]		Sub [REDACTED]		Class [REDACTED]		Category [REDACTED]	
Degree [REDACTED]		Attempt [REDACTED]		Offense Name [REDACTED]		Count [REDACTED]		Victim Sex [REDACTED]	
Handicap [REDACTED]		Assoc. No. [REDACTED]		Type [REDACTED]					
118. Law [REDACTED]		Article & Section [REDACTED]		Sub [REDACTED]		Class [REDACTED]		Category [REDACTED]	
Degree [REDACTED]		Attempt [REDACTED]		Offense Name [REDACTED]		Count [REDACTED]		Victim Sex [REDACTED]	
Handicap [REDACTED]		Assoc. No. [REDACTED]		Type [REDACTED]					
119. Law [REDACTED]		Article & Section [REDACTED]		Sub [REDACTED]		Class [REDACTED]		Category [REDACTED]	
Degree [REDACTED]		Attempt [REDACTED]		Offense Name [REDACTED]		Count [REDACTED]		Victim Sex [REDACTED]	
Handicap [REDACTED]		Assoc. No. [REDACTED]		Type [REDACTED]					
120. Law [REDACTED]		Article & Section [REDACTED]		Sub [REDACTED]		Class [REDACTED]		Category [REDACTED]	
Degree [REDACTED]		Attempt [REDACTED]		Offense Name [REDACTED]		Count [REDACTED]		Victim Sex [REDACTED]	
Handicap [REDACTED]		Assoc. No. [REDACTED]		Type [REDACTED]					
121. Law [REDACTED]		Article & Section [REDACTED]		Sub [REDACTED]		Class [REDACTED]		Category [REDACTED]	
Degree [REDACTED]		Attempt [REDACTED]		Offense Name [REDACTED]		Count [REDACTED]		Victim Sex [REDACTED]	
Handicap [REDACTED]		Assoc. No. [REDACTED]		Type [REDACTED]					
122. Law [REDACTED]		Article & Section [REDACTED]		Sub [REDACTED]		Class [REDACTED]		Category [REDACTED]	
Degree [REDACTED]		Attempt [REDACTED]		Offense Name [REDACTED]		Count [REDACTED]		Victim Sex [REDACTED]	
Handicap [REDACTED]		Assoc. No. [REDACTED]		Type [REDACTED]					
123. Law [REDACTED]		Article & Section [REDACTED]		Sub [REDACTED]		Class [REDACTED]		Category [REDACTED]	
Degree [REDACTED]		Attempt [REDACTED]		Offense Name [REDACTED]		Count [REDACTED]		Victim Sex [REDACTED]	
Handicap [REDACTED]		Assoc. No. [REDACTED]		Type [REDACTED]					
124. Law [REDACTED]		Article & Section [REDACTED]		Sub [REDACTED]		Class [REDACTED]		Category [REDACTED]	
Degree [REDACTED]		Attempt [REDACTED]		Offense Name [REDACTED]		Count [REDACTED]		Victim Sex [REDACTED]	
Handicap [REDACTED]		Assoc. No. [REDACTED]		Type [REDACTED]					
125. Law [REDACTED]		Article & Section [REDACTED]		Sub [REDACTED]		Class [REDACTED]		Category [REDACTED]	
Degree [REDACTED]		Attempt [REDACTED]		Offense Name [REDACTED]		Count [REDACTED]		Victim Sex [REDACTED]	
Handicap [REDACTED]		Assoc. No. [REDACTED]		Type [REDACTED]					
126. Law [REDACTED]		Article & Section [REDACTED]		Sub [REDACTED]		Class [REDACTED]		Category [REDACTED]	
Degree [REDACTED]		Attempt [REDACTED]		Offense Name [REDACTED]		Count [REDACTED]		Victim Sex [REDACTED]	
Handicap [REDACTED]		Assoc. No. [REDACTED]		Type [REDACTED]					
127. Law [REDACTED]		Article & Section [REDACTED]		Sub [REDACTED]		Class [REDACTED]		Category [REDACTED]	
Degree [REDACTED]		Attempt [REDACTED]		Offense Name [REDACTED]		Count [REDACTED]		Victim Sex [REDACTED]	
Handicap [REDACTED]		Assoc. No. [REDACTED]		Type [REDACTED]					
128. Law [REDACTED]		Article & Section [REDACT							

27 of 34

On the Date Written Below LETTERS are Granted by the Surrogate's Court, State of New York as follows:

Name of : Paul G. Watkins **File #: 2022-18/A**
Date of Death: December 17, 2021
Domicile of : County of Onondaga
Fiduciary Appointed: Lauren E Valchine
Mailing Address [REDACTED]
Baldwinsville NY 13027

Letters Issued: LIMITED LETTERS OF ADMINISTRATION

Limitations: Said administrator(s), in both his/her/their individual and fiduciary capacity/capacities as well as any attorney who represents him/her/them in either capacity/capacities, shall not collect or receive the proceeds from any action instituted or settled pursuant to the authority granted by these letters without the further order of this court or any court of competent jurisdiction pursuant to EPTL 5-4.6

THESE LETTERS, granted pursuant to a decree entered by the court, authorize and empower the above-named fiduciary or fiduciaries to perform all acts requisite to the proper administration and disposition of the estate/trust of the in accordance with the decree and the laws of New York State, subject to the limitations and restrictions, if any, as set forth above.

Dated: February 10, 2022

IN TESTIMONY WHEREOF, the seal of the Onondaga County Surrogate's Court has been affixed.

WITNESS, Hon Mary Keib Smith, Judge of the Onondaga County Surrogate's Court.

Eileen A. Casey
Eileen A. Casey, Esq., Chief Clerk

These Letters are Not Valid Without the Raised Seal of the Onondaga County Surrogate's Court

Attorney:
Laurence A. Wangerman
333 East Onondaga Street, Suite 4B
Syracuse NY 13202



New York State Department of Health

Certificate of Marriage Registration

District Name CLAY
 District No. 3352
 Local Register No. 229

This is to certify that the persons identified below were married on the date and at the place specified as shown by the duly registered license and certificate of marriage on file in this office

Groom Name PAUL GERARD WATKINS
 First Middle Premarriage Surname
☒ Check box if same as premarriage surname

New Surname (if applicable)

Residing at [REDACTED] NORTH SYRACUSE, NY

Date of Birth [REDACTED] 1983 Place of Birth SYRACUSE, NY
 Month Day Year City, Town or Village/State or County

Bride Name LAUREN ELIZABETH VALCHINE WATKINS
 First Middle Premarriage Surname Maiden Name
 (if different from premarriage surname)
☐ Check box if same as premarriage surname

New Surname (if applicable)

Residing at [REDACTED] NORTH SYRACUSE, NY

Date of Birth [REDACTED] 1982 Place of Birth DARIEN IL
 Month Day Year City, Town or Village/State or County

Date of Marriage 12/31/2010 Place of Marriage NORTH SYRACUSE, NY
 Month Day Year City, Town or Village/State or County

(SEAL)

Town or City Clerk [Signature] 01/04/2011
 Month Day Year

☐ If checked, this marriage was a second or subsequent ceremony.


Do not accept this transcript unless the raised seal of the issuing locality is affixed thereto.

Any Alteration Invalidates This Certificate

See Reverse Side For A List of Security Features Used In This Form

DOH-130 (9/2001)


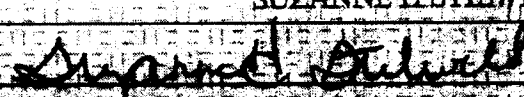
Recorded District 3361	New York State Department of Health Vital Records Section		State File Number: 131-2007-00018177	
Register Number 0927	CERTIFICATE OF BIRTH			
Infant	1A. Name: First Nathan		Middle Michael	Last Watkins
	2A. Date of Birth: [REDACTED] 2007	2B. Hour 8:51 AM	3. Sex Male	4A. Birth In: (Single, Twin, etc.) Single
Place	6A. Locality of Birth: Town of Onondaga			6B. County of Birth: Onondaga
Mother	4A. Name: First Amanda		Middle Sylvia	Maiden Last Name Gianni
	6B. Date of Birth: [REDACTED] 1989	6C. City & State of Birth: (Country, if not U.S.A.) Syracuse, New York		
	7A. Residence, State: (Country, if not U.S.A.) New York		7B. County: (For, or Prov., if not USA) Onondaga	
	7C. Locality: City of Syracuse		7E. Inside City/Village Limits? YES	
	7F. Street and Number of Residence: [REDACTED]		7D. Zip Code: 13208	
	8A. Mailing Address: [REDACTED] . Syracuse . New York		8B. Zip Code: 13208	
Father	9A. Name: First Paul		Middle Gerard	Last Watkins
	9B. Date of Birth: [REDACTED] 1983	9C. City & State of Birth: (Country, if not U.S.A.) Syracuse, New York		
10A. Local Filing Date March 05, 2007		10B. Amendment Filing Date: November 21, 2007		10C. Amendment Number: [REDACTED]
10D. I, the undersigned, and the candidate were filed pursuant to the provisions of Public Health Law Section §120b. Peter M. Corcoran Peter M. Corcoran Deputy of Vital Records				

Recorded District 3300	New York State Department of Health CERTIFICATE OF LIVE BIRTH	State File Number:  131-2010-00101614
Register Number 5814		

INFANT	1A. Name: First Makyla	Middle Marie	Last Watkins		
	2A. Date of Birth: [REDACTED] 2010	2B. Hour: 11:43 AM	3. Sex: Female	4A. Birth is: Single	4B. If Not Single, Birth is:
	5. Place of Birth: Hospital	6A. Facility Name: (Address, if Place of Birth is Other than Hospital / Birthing Center) Crouse Hospital			
	6B. Locality of Birth: City of Syracuse	6C. County of Birth: Onondaga			

MOTHER	7A-1. Name: First Lauren	Middle Elizabeth	Current Last Name Valchine
	7A-2. Last Name on Birth Certificate: Valchine	7B. Date of Birth: [REDACTED] 1982	7C. City & State of Birth: (Country, if not U.S.A.) Darien, Illinois
	8A. Residence, State: (Country, if not U.S.A.) New York	8B. County: (State or Prov., if not U.S.A.) Onondaga	
	8C. Locality: Town of Clay	8D. Inside City/Village Limit?	
	8E. Street and Number of Residence: [REDACTED]	8F. Zip Code: 13212	
	8G. Mailing Address: [REDACTED], North Syracuse, NY	8H. Zip Code: 13212	

FATHER	9A-1. Name: First Paul	Middle Gerard	Current Last Name Watkins
	9A-2. Last Name on Birth Certificate: Watkins	9B. Date of Birth: 05/04/1983	9C. City & State of Birth: (Country, if not U.S.A.) Syracuse, New York

ATTENDANT	10A. I certify that the stated information concerning this child is true to the best of my knowledge and belief.	10B. Date Signed: 11 10 10
	Signature: 	Title:
	10C. Name of Certifier, if Not Attendant:	10D-1. NYS License Number: (Certified)
	10E. Attendant's Name: LOFTUS WILLIAM JOSEPH	Title: M.D.
11A. Registrar Name: SUZANNE H STILWELL		
11B. Signature of the Registrar: 	11C. Date Filed: NOV 23 2010	

12. Information Added or Corrected:	Noted	Date of Correction	Authorization	Original Information

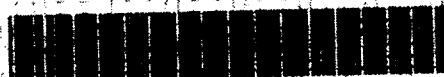
DOH-1963E (09/2008)

Recorded District
3309
Register Number
5492

New York State Department of Health

CERTIFICATE OF LIVE BIRTH

State File Number:



131-2017-00088960

INFANT	1A. Name: First Weston	Middle Marlin	Last Watkins		
	2A. Date of Birth: [REDACTED], 2017	2B. Hour: 1:35 AM	3. Sex: Male	4A. Birth is: Single	4B. If Not Single, Birth is:
	5. Place of Birth: Hospital		6A. Facility Name: (Address, if Place of Birth is Other than Hospital / Birthing Center) Upstate University Hospital at Community General		
	6B. Locality of Birth: Town of Onondaga		6C. County of Birth: Onondaga		

MOTHER	7A-1. Name: First Lapen	Middle Elizabeth	Current Last Name Valchinc
	7A-2. Last Name on Birth Certificate: Valchinc	7B. Date of Birth: [REDACTED] 1982	7C. City & State of Birth: (Country, if not U.S.A.) Danon, Illinois
	8A. Residence, State: (Country, if not U.S.A.) New York	8B. County: (State or Foreign, if not U.S.A.) Onondaga	
	8C. Locality: Town of Lysander	8D. Home City/Village/Limit?	
	8E. Street and Number of Residence: [REDACTED]	8F. Zip Code: 13027	
8G. Mailing Address: [REDACTED] Baldwinsville, NY		8H. Zip Code: 13027	

FATHER	9A-1. Name: First Paul	Middle Gerard	Current Last Name Watkins
	9A-2. Last Name on Birth Certificate: Watkins	9B. Date of Birth: 05/04/1983	9C. City & State of Birth: (Country, if not U.S.A.) Syracuse, New York

ATTENDING PHYSICIAN	10A. I certify that the stated information concerning this child is true to the best of my knowledge and belief.			10B. Date Signed: Month: 11, Day: 01, Year: 2017
	Signature: [Signature]			10D-1. NYS License Number: (Country)
	10C. Name of Certifier, if Not Attendant:			10E-1. NYS License Number: (Country)
	10E. Attendant's Name: LOUGHLIN BARBARA J			10F. Date: NOV 16 2017
	11A. Registrar Name: RUTH ANN RIPOSA			

12. Information Added or Corrected:
Item No. Date of Correction Authorization Original Information

DOH-1965a (02/2009)

NYSDCF DOB

Recorded Number 3300	CERTIFICATE OF LIVE BIRTH State of New York [REDACTED] 131-2018-00100211
Register Number 6224	

1A. Name: First Rosella	Middle Hope	Last Waldman
2A. Date of Birth: 08/08/2018	3A. Sex: Female	4A. Birth in: USA
5. Place of Birth: Hospital		
6A. Locality of Birth: Town of Onondaga		

7A. Name: First Joseph	Middle Elizabeth	Current Last Name Waldman
8A. Residence, State (County, if not USA) New York		
9A. Locality: Town of Onondaga		
10. Street and Number of Residence: [REDACTED]		
11A. Mailing Address: [REDACTED] Baldwinsville, NY		

12A.1 Name: First David	Middle Joseph	Current Last Name Waldman
12A.2. Is this a 1st Birth Certificate? Yes		

13A. (Seal) and Signature of Registrar [Signature]	13B. Date of Issuance 02/16/2023
14A. Name of Child: First Middle Last WEINSTEIN ROSEMARY MARIE	14B. Date of Birth 02/16/2023
15A. Standard Name: LOPEZ ALFREDO	15B. Date of Birth 02/16/2023
16A. Registrar Name: [Signature]	

17. Information Added or Deleted:			
Item No.	Date of Correction	Authorization	Original Information



DOB-10000 (04/2009)

Recorded District 3300	New York State Department of Health CERTIFICATE OF LIVE BIRTH	State File Number: 131-2015-00083005
Register Number 3731		

1A. Name: First Cotton	Middle Gerard	Last Watkins		
2A. Date of Birth: 08/08/2015	2B. Hour: 8:42 PM	3. Sex: Male	4A. Birth is: Single	4B. If Not Single, Birth is:
5. Place of Birth: Hospital		6A. Facility Name: (Address, if Place of Birth is Other than Hospital / Birthing Center) Crouse Hospital		
6B. Locality of Birth: City of Syracuse		6C. Country of Birth: Croatia		

7A-1. Name: First Laurin	Middle Elizabeth	Current Last Name Vachine
7A-2. Last Name on Birth Certificate: Vachine	7B. Date of Birth: 08/08/2002	7C. City & State of Birth: (Country, if not U.S.A.) Darien, Illinois
8A. Birthplace, State: (Country, if not U.S.A.) New York	8B. Country of Birth, if not U.S.A.: Croatia	
9. Date of Issuance: 08/08/2015		
10. Date of Registration: 08/08/2015		
11. Date of Filing: 08/08/2015		
12. Date of Recording: 08/08/2015		
13. Date of Issuance: 08/08/2015		
14. Date of Registration: 08/08/2015		
15. Date of Filing: 08/08/2015		
16. Date of Recording: 08/08/2015		
17. Date of Issuance: 08/08/2015		
18. Date of Registration: 08/08/2015		
19. Date of Filing: 08/08/2015		
20. Date of Recording: 08/08/2015		

8C-1. Name: First Paul	Middle Gerard	Current Last Name Watkins
8C-2. Last Name on Birth Certificate: Watkins	8D. Date of Birth: 05/04/1985	8E. City & State of Birth: (Country, if not U.S.A.) Syracuse, New York

16A. I certify that the stated information concerning this child is true to the best of my knowledge and belief.	16B. Date: 08/08/2015
Signature: 	16C. Date: 08/08/2015
16D. Name of Certifier, if Not Attending: RUTH ANN TIBBELS	16E. Date: 08/08/2015
16F. Signature of the Registrar: 	16G. Date: 08/08/2015

17. Date of Issuance: 08/08/2015	18. Date of Registration: 08/08/2015	19. Date of Filing: 08/08/2015	20. Date of Recording: 08/08/2015
21. Date of Issuance: 08/08/2015	22. Date of Registration: 08/08/2015	23. Date of Filing: 08/08/2015	24. Date of Recording: 08/08/2015
25. Date of Issuance: 08/08/2015	26. Date of Registration: 08/08/2015	27. Date of Filing: 08/08/2015	28. Date of Recording: 08/08/2015
29. Date of Issuance: 08/08/2015	30. Date of Registration: 08/08/2015	31. Date of Filing: 08/08/2015	32. Date of Recording: 08/08/2015
33. Date of Issuance: 08/08/2015	34. Date of Registration: 08/08/2015	35. Date of Filing: 08/08/2015	36. Date of Recording: 08/08/2015
37. Date of Issuance: 08/08/2015	38. Date of Registration: 08/08/2015	39. Date of Filing: 08/08/2015	40. Date of Recording: 08/08/2015
41. Date of Issuance: 08/08/2015	42. Date of Registration: 08/08/2015	43. Date of Filing: 08/08/2015	44. Date of Recording: 08/08/2015
45. Date of Issuance: 08/08/2015	46. Date of Registration: 08/08/2015	47. Date of Filing: 08/08/2015	48. Date of Recording: 08/08/2015
49. Date of Issuance: 08/08/2015	50. Date of Registration: 08/08/2015	51. Date of Filing: 08/08/2015	52. Date of Recording: 08/08/2015
53. Date of Issuance: 08/08/2015	54. Date of Registration: 08/08/2015	55. Date of Filing: 08/08/2015	56. Date of Recording: 08/08/2015
57. Date of Issuance: 08/08/2015	58. Date of Registration: 08/08/2015	59. Date of Filing: 08/08/2015	60. Date of Recording: 08/08/2015
61. Date of Issuance: 08/08/2015	62. Date of Registration: 08/08/2015	63. Date of Filing: 08/08/2015	64. Date of Recording: 08/08/2015
65. Date of Issuance: 08/08/2015	66. Date of Registration: 08/08/2015	67. Date of Filing: 08/08/2015	68. Date of Recording: 08/08/2015
69. Date of Issuance: 08/08/2015	70. Date of Registration: 08/08/2015	71. Date of Filing: 08/08/2015	72. Date of Recording: 08/08/2015
73. Date of Issuance: 08/08/2015	74. Date of Registration: 08/08/2015	75. Date of Filing: 08/08/2015	76. Date of Recording: 08/08/2015
77. Date of Issuance: 08/08/2015	78. Date of Registration: 08/08/2015	79. Date of Filing: 08/08/2015	80. Date of Recording: 08/08/2015
81. Date of Issuance: 08/08/2015	82. Date of Registration: 08/08/2015	83. Date of Filing: 08/08/2015	84. Date of Recording: 08/08/2015
85. Date of Issuance: 08/08/2015	86. Date of Registration: 08/08/2015	87. Date of Filing: 08/08/2015	88. Date of Recording: 08/08/2015
89. Date of Issuance: 08/08/2015	90. Date of Registration: 08/08/2015	91. Date of Filing: 08/08/2015	92. Date of Recording: 08/08/2015
93. Date of Issuance: 08/08/2015	94. Date of Registration: 08/08/2015	95. Date of Filing: 08/08/2015	96. Date of Recording: 08/08/2015
97. Date of Issuance: 08/08/2015	98. Date of Registration: 08/08/2015	99. Date of Filing: 08/08/2015	100. Date of Recording: 08/08/2015